



BellSouth Telecommunications, Inc.
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REC'D TN
REGULATORY AUTH

Guy M. Hicks
General Counsel

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May 7, 2002

OFFICE OF THE
EXECUTIVE SECRETARY

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VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Petition of Cinergy Communications Company for Arbitration of an
Interconnection Agreement with BellSouth Telecommunications, Inc.
pursuant to the Telecommunications Act of 1996*
Docket No. 01-00987

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Objections to the First Data Requests of Cinergy Communications Company. Copies of the enclosed are being provided to counsel for Cinergy.

Very truly yours,

Guy M. Hicks

GMH:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition of Cinergy Communications Company for Arbitration of an Interconnection Agreement with BellSouth Telecommunications, Inc. pursuant to the Telecommunications Act of 1996*

Docket No. 01-00987

**BELLSOUTH'S OBJECTIONS TO THE FIRST DATA
REQUESTS OF CINERGY COMMUNICATIONS COMPANY**

BellSouth Telecommunications, Inc. ("BellSouth") hereby files its objections to Cinergy Communications Company's ("Cinergy") First Set of Data Requests.

GENERAL OBJECTIONS

BellSouth objects to the "Definitions" set forth in Cinergy's data requests to the extent such "Definitions" attempt to impose obligations upon BellSouth that are not required by the Tennessee Rules of Civil Procedure or the Rules of the Tennessee Regulatory Authority.

SPECIFIC OBJECTIONS

10. What is the total number of voice grade loops purchased by CLECs from BellSouth as unbundled network elements in BellSouth's service area in Tennessee?
11. Identify each central office and remote terminal where such purchases are occurring. Objection: BellSouth objects to Data Request No. 11 in that it is unduly burdensome and oppressive. First, it is not clear that the data that would be responsive to this question exists, particularly at the remote terminal level. Even if

this information exists, it would be unduly burdensome, expensive and generally onerous for BellSouth to research and obtain this information. If all of the information were available, deriving the information would require an intensive effort that would be expensive and time consuming.

12. What is the total number of BellSouth loops purchased by CLECs to provide DSL service in BellSouth's service area in Tennessee?

13. Identify each central office and remote terminal where such purchases are occurring. Objection: BellSouth objects to Data Request No. 13 in that it is unduly burdensome and oppressive. First, it is not clear that the data that would be responsive to this question exists, particularly at the remote terminal level. Even if this information exists, it would be unduly burdensome, expensive and generally onerous for BellSouth to research and obtain this information. If all of the information were available, deriving the information would require an intensive effort that would be expensive and time consuming.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By: 

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CERTIFICATE OF SERVICE

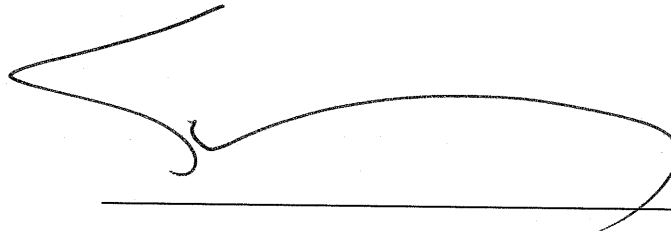
I hereby certify that on May 7, 2002, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☒ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight
- ☐ Electronic

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A handwritten signature in black ink, appearing to read 'Bob Bye', is written over a horizontal line.